

NEM:LS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

COMPLAINT

- against -

(18 U.S.C. § 2423(a))

DYLAN PETERSON,

No. 24-MJ-422

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

MICHAEL BUSCEMI, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

On or about June 13, 2024, within the Eastern District of New York and elsewhere, the defendant DYLAN PETERSON did knowingly and intentionally transport a person who had not attained the age of 18 years, in interstate commerce, to wit: from Tulsa, Oklahoma to Queens, New York, with the intent to engage in sexual activity with that individual, for which DYLAN PETERSON could be charged with a criminal offense, to wit: Rape in the third degree, in violation of New York Penal Law § 130.25(2).

(Title 18, United States Code, Section 2423(a))

The source of your deponent's information and the grounds for his belief are as follows:¹

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and I am currently assigned to the Violent Crimes Against Children and Human Trafficking Task Force. I have been involved in the investigation of numerous cases involving the trafficking and exploitation of children. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant’s criminal history record; and from reports of other law enforcement officers involved in the investigation.

PETERSON and Victim-1’s Communications

2. Between approximately June 2023 and June 2024, a minor female individual known to me (“Victim-1”) and PETERSON exchanged messages on the instant messaging platform Discord. Based on my training and experience, I know that Discord allows users to share text and voice messages as well as photographs and videos with other users. I know that Discord can be accessed both as an application on cellular devices and via web browser on computers.

3. On or about June 12, 2024, law enforcement agents in Tulsa, Oklahoma responded to a report of a missing person at Victim-1’s house. Victim-1’s mother provided consent for law enforcement agents to search a shared computer.

4. On the computer, law enforcement agents in Tulsa, Oklahoma reviewed an account on Discord belonging to Victim-1, which was shown to law enforcement by Victim-1’s sister, and which contained correspondence between Victim-1 and another participant between 2023 and 2024. Throughout the interactions, Victim-1 regularly called the subject “Dylan.” While checking sketchbooks and notebooks at the residence which Victim-1 had been known to occasionally use, law enforcement discovered the name “Dylan Peterson” within these

notebooks. In the Discord conversations, the other user provided a phone number, which law enforcement determined was associated with PETERSON.

5. In the correspondence, Victim-1 sent nude photographs of herself as well as videos of herself nude to PETERSON. The conversations between Victim-1 and PETERSON contained discussions relating to engaging in sexual activity with Victim-1 and coordinating a time and location for PETERSON to meet Victim-1 to engage in the sexual activity.

6. Discord communications between Victim-1 and PETERSON reflect Victim-1 telling PETERSON that she was sixteen years old, which information was confirmed by Victim-1's birth certificate subsequently obtained by law enforcement. In response, PETERSON misrepresented his true age (25) to appear to be a minor. On June 4, 2024, at approximately 10:22 PM, Victim-1 wrote "I'm 16" and PETERSON wrote "And I'm 15."

PETERSON and Victim-1's Travel to New York City


7. On or about June 12, 2024, Victim-1 and PETERSON traveled from Tulsa, Oklahoma to LaGuardia Airport in Queens, New York ("LGA").

8. On or about June 13, 2024, PETERSON was arrested at LGA by Port Authority Police for endangering the welfare of a minor. PETERSON was with Victim-1 at the time of his arrest.

9. On or about June 14, 2024, after an evaluation at a medical facility, PETERSON was arrested by the FBI. Thereafter, the defendant PETERSON was transported to the FBI for processing. After being advised of his Miranda rights, PETERSON waived those rights and made a statement wherein he acknowledged, in sum and in part, that he carried on communications with Victim-1 via electronic messaging platforms, received nude photographs

of Victim-1 that PETERSON directed Victim-1 to produce, and met with Victim-1 in Tulsa, Oklahoma to travel to LGA. PETERSON stated that on or about June 10, 2024, PETERSON took a long-distance bus from Elmira, New York, where he is believed to live, to Tulsa, Oklahoma, where Victim-1 resided, after which PETERSON and Victim-1 traveled to LGA. Victim-1 stated to a social worker at a medical facility that PETERSON purchased her airfare to LGA. PETERSON advised law enforcement that his family purchased the airfare to LGA.

WHEREFORE, your deponent respectfully requests that the defendant DYLAN PETERSON, be dealt with according to law.



MICHAEL BUSCEMI
Special Agent, Federal Bureau of Investigation

Sworn to before me this
14th day of June, 2024

DGE

NEW YORK